

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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|---|-----------------------|---------------------|
| MARA Z. UNDERWOOD, M.D., | : | CASE NO. 02-CV-2714 |
| | : | |
| Plaintiff | : | |
| | : | |
| v. | : | |
| | : | |
| THE PAUL REVERE INSURANCE GROUP, and its successor, agent or assign THE UNUM PROVIDENT CORPORATION, | : : : : : | |
| and | : | |
| | : | |
| THE PENN MUTUAL LIFE INSURANCE COMPANY, | : : : : | |
| and | : | |
| | : | |
| CIGNA GROUP INSURANCE & LIFE INSURANCE COMPANY OF NORTH AMERICA, | : : : : : | |
| Defendants | : | |
| | : | |

CERTIFICATION OF KATHRYN R. RENAHAN

Kathryn R. Renahan, of full age, as counsel for Defendant The Penn Mutual Life Insurance Company, hereby certifies as follows:

1. All mandatory disclosures and discovery in this case are governed by the Scheduling Order filed August 13, 2002. A true copy of that Order is attached hereto as Exhibit 1.
2. Defendant PennMutual has produced all mandatory disclosures and provided all discovery demanded of it to date.

3. On October 4, 2002, Defendant PennMutual served Plaintiff with Interrogatories and Document Requests. Although the responses to these requests were due on November 4, 2002, Plaintiff has not yet provided her responses.

4. Receipt of Plaintiff's responses to these requests are essential to all Defendants to prepare for the deposition of Plaintiff. Accordingly, Defendants have not yet taken Plaintiff's deposition.

5. The discovery end date in this matter is currently December 20, 2002. Plaintiff's counsel has indicated that Plaintiff's discovery responses will be provided shortly and that Plaintiff will be made available for her deposition in early to mid-December.

6. Accordingly, it is believed that Plaintiff's deposition will be completed before the current discovery end date. However, this places the deposition very close to the present discovery deadline of December 20, 2002, and defense counsel are, therefore, concerned that an extension of the deadline must be sought to ensure that this case is properly prepared for trial.

7. Defendants respectfully request that the Scheduling Order be extended sixty (60) days so that all counsel are able to comply with the deadlines set therein. Plaintiff's counsel consents to this request. All Defendants join in the request for this extension.

8. This is the only request for an extension in this matter.

9. PennMutual, together with Defendants, The Paul Revere Insurance Group and CIGNA Group Insurance & Life Insurance Company of North America, therefore, respectfully request that this Court grant this motion for a sixty (60) day extension to the deadlines in the Scheduling Order. Plaintiff's counsel consents to this request.

10. A proposed amended form of Scheduling Order is being submitted together with this motion.

I CERTIFY that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: November 25, 2002

KATHRYN R. RENAHAN (45597)

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